

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
DENNIS WILSON,)
)
Defendant.)

Case Number: CR 05 1849 JH

UNOPPOSED MOTION TO SET CONDITIONS OF RELEASE

The Defendant, Dennis Wilson, by his attorney, Robert J. Gorence of Gorence & Oliveros, P.C., respectfully requests the Court to vacate the Order of Detention that was entered May 1, 2006, and to set conditions of release pursuant to 18 U.S.C. § 3142 et. seq. As grounds for this motion, Defendant states:

1. On May 1, 2006, after a hearing on this matter Mr. Wilson was ordered detained because of his inability to locate a suitable third-party custodian. A third-party custodian suitable to the government and to U.S. Probation and Pretrial Officer Sandra Avila-Toledo has been identified as Mr. Wilson's mother, Rebecca Wilson. Mrs. Wilson resides at 1513 Gschwind Pl., SW, Albuquerque, NM 87121, telephone number (505) 836-4273.

2. With the concurrence of U.S. Probation and Pretrial Officer Sandra Avila-Toledo, the government and Mr. Wilson agree to the following additional conditions of release:

a. Mr. Wilson will undergo electronic monitoring as directed by Probation and Pretrial under the home detention program.

b. Mr. Wilson will stay gainfully employed with his son, Dennis Wilson, Jr., in the construction company that they own jointly.

c. Mr. Wilson agrees to post real estate with the Court in an amount of \$100,000.00. It is the understanding of the parties that Dennis Wilson, Jr. will satisfy this requirement by posting two lots that are owned by the family in Taos County with the Court and that this will be done with a Special Warranty Deed no later than July 17, 2006.

d. Mr. Wilson agrees to limit his travel to Bernalillo County. If Mr. Wilson possesses a passport, he will relinquish it to U.S. Probation and Pretrial.

e. Mr. Wilson agrees to have no contact whatsoever with any of his co-defendants and/or witnesses in this case.

f. Mr. Wilson agrees that he will refrain from all non-prescribed drug and alcohol use while on conditions of release.

g. Mr. Wilson agrees to participate in a drug and/or alcohol treatment program as deemed necessary by Probation and Pretrial Services.

g. Mr. Wilson concurs that all other standard conditions of release will also be imposed on the order setting conditions of release.

3. AUSA James R.W. Braun concurs in this motion, as does U.S. Probation and Pretrial Officer Sandra Avila-Toledo.

WHEREFORE, for the reasons stated above, Defendant respectfully requests this Court rescind the Order of Detention and set conditions of release.

Respectfully submitted,

Electronically filed: 06/22/06

Robert J. Gorence
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I HEREBY CERTIFY that a true and correct copy of the foregoing has been faxed to AUSA James R.W. Brawn and to U.S. Probation and Pretrial Officer Sandra Avila-Toledo this 22nd day of June, 2006.

Electronically filed: 6/22/06
ROBERT J. GORENCE